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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

IRONSHORE INDEMNITY INC.,

Plaintiff,

vs.

ADAM ROGAS and ERIC KAY,

Defendants.

Case No. 2:21-cv-01706-JAD-BNW

**STIPULATION TO EXTEND THE
TIME TO RESPOND TO THE
COMPLAINT**

(FIRST REQUEST)

Plaintiff Ironshore Indemnity Inc. (“Ironshore”) and defendant Eric Kay (“Mr. Kay”) stipulate that the deadline for Kay to respond to the complaint (ECF No. #1) be extended from November 19, 2021 until December 12, 2021

This extension is requested to because co-defendant Adam Rogas previously requested, and Ironshore has consented to, a three-week extension for Mr. Rogas to respond to the complaint. Although the initial stipulated extension for Mr. Rogas was denied without prejudice for Mr. Rogas (Dkt. 12), Mr. Rogas’s counsel advises that they are in the process of filing another stipulation citing cause due to the recent hiring of Nevada counsel, multiple related pending matters in which lead

counsel represent Mr. Rogas, and the infancy of this case such that the extension is sought in good faith and is not for the purposes of delay or prejudice to any other party.

Ironshore and Mr. Kay agree that causes also exists for the same extension for Mr. Kay. This extension will keep the action on the same timelines for both defendants. Additionally, this case also has just recently been filed, and the request is made in good faith without the purpose of delay or prejudice to any other party.

Based on the above, Ironshore and Mr. Kay stipulate and request the court order that the time for Mr. Kay to respond to the complaint is extended from November 19, 2021, through December 12, 2021, subject to this court's order.

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: November 22, 2021